

From: [Gent, Philip \(ECY\)](#)
To: [Hardisty, Doug](#)
Cc: [Dosssett, Donald](#); [Skinnarland, Ron \(ECY\)](#); [McFadden, Daina \(ECY\)](#); [Martell, P John \(DOH\)](#); [Schmidt, John W \(DOH\)](#)
Subject: FW: AOP schedule
Date: Monday, April 18, 2016 9:31:10 AM
Attachments: [RE_AOP_schedule.msg](#)

Doug and Don,

I thought I had sent this out, but maybe I didn't.

See the red-line for new tentative dates. If EPA uses the full 45 days of review, that would be from 6/17/2016 to 8/1/2016. Needing time to process the AOP through our system will result in an issuance date around 8/10 to 8/12.

I can send the R2C for the majority of the Hanford AOP today, but I'm still working with the AGs to resolve 9 of the 109 comments (which won't be done until later this week).

As we are tracking about a week ahead of schedule, that could move the issue date to 8/3 to 8/5.

I also have administrative issues that need to be factored into any of the dates and times. The major one is the Permit Register, which only publishes on the 10th and the 25th and is a requirement by WA regulations and AOPs.

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From: Gent, Philip (ECY)
Sent: Thursday, April 07, 2016 11:16 AM
To: Skinnarland, Ron (ECY)
Subject: FW: AOP schedule

Ron,

I adjusted the schedule as shown in red and knockout below.

EPA needs this complete before August, but July 1 is the start of a quarter on Hanford and it creates less effort on their part to have dates associated with the start of quarters. If it slips past July 1, Hanford would prefer a start of the month date (e.g. August 1) to minimize work on their part. Selecting an intermediate July date creates the most work in separating data for reports by Hanford and is the least desirable option for them.

Activity	Estimated Duration	Early Finish	Late Finish	Actual Date	Comments
Finish draft Response to Comments (R2C)	20 to 30 working days	2/26/16	3/11/16	3/15/2016	1. DOH is supporting an ingestion exercise at Columbia Generating Station in February. This requires training and meetings that will compete for resources. 2. Ecology is still receiving NOCs that, by rule, take priority over the AOP. This requires resource allocation issues. 3. Time to respond to Hanford Challenge comments required additional research time into and with the Hanford Vapor Report. 4. Health had commitments with Columbia Generating Station to assist and participate in safety drills.
Provide draft R2C to Washington AAGs for review	10 working days	3/11/16	3/25/16	4/15/2016	1. AAG support time for AOP review will be competing with NOC review support. 2. Extended time for AAG review to facilitate AAG schedule and provide time for more in-depth advice.
Incorporate any changes from AAG review	5 working days	3/18/16	4/1/16 4/22/2016		1. Still need time to incorporate advice and comments 2. Unsure of the volume and complexity of the advice, so this could result in extended hours and coordination to complete by the scheduled date.
Provide draft R2C to EPA for review on response to Request to Object petition	10 working days	4/1/16 5/6/2016	4/15/16 5/6/2016		1. This review is specific to looking at the R2C from the stand point of response to the Petition to Object. 2. EPA will still have the formal 45-day review (see below), so this review is more specific to the granting of a portion of the Petition to Object. 3. EPA has requested (Don Dosssett email on 4/7/2016) this pre-review period occur. It was removed to provide additional time for AAG review, but will be added back in. 4. Requesting review completion in ten days.
Incorporate any changes from EPA	5 working days	4/8/16	4/22/16		

review		5/13/2016	5/13/2016
Prepare Proposed Permit for format and make available electronically	7 working days	5/24/2016 5/25/2016	5/24/2016 5/25/2016

1. Date needs to move to the 25th to match with the Permit Register.

Submit Proposed Permit and R2C to EPA for forty-five day review	45 calendar days (See comment 3)	5/27/16 7/8/2016 (45 day date) 6/17/2016	6/10/16 7/9/2016 (See comment 4)
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1. Formal review of the AOP and R2C
2. Likely will take 45 days when considering last request to object
3. EPA email from Don Dossett on 4/7/2016 indicates pre-review of R2C could reduce need for full 45 days to review Proposed Final AOP.
4. With a full 45 day review by EPA, the end date would be 7/9/2015. As this is a Saturday, I will miss the permit register – it will go out on 7/8/2016. As a result, the next permit register date is 7/25/2016 and this would lead to an 8/1/2016 effective date.

Incorporate changes	5 working days	6/3/16 6/23/2016	6/17/2016 7/15/2016
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1. Permit production need date. This is needed to produce (print) the final permit and issue.

Issue Final Hanford AOP, Revision B		7/1/16	7/1/16 8/1/2016
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1. Issuance of the final AOP will occur on the start of a FFY quarter to facilitate tracking.
2. Early completion (e.g. 6/3/16) will still have an effective permit date of 7/1/16

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